

November 22, 2011

**VIA ELECTRONIC FILING**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: WC Docket No. 11-42 - Lifeline and Link Up Reform and Modernization  
**NOTICE OF EX PARTE PRESENTATION**

Dear Ms. Dortch:

Attached to this letter is a paper authored by Deborah Taylor Tate, former Commissioner and former Chair of the Federal-State Joint Board on Universal Service, and published by the Free State Foundation. The paper is entitled "FCC Should Pursue Solutions to Make Lifeline an Efficient Job Line."

In her paper, Commissioner Tate references the recent joint submission by TracFone Wireless, Inc. and Nexus Communications (letter from Danielle Frappier to Marlene H. Dortch, Secretary, Federal Communications Commission, filed in WC Docket No. 11-42, November 18, 2011). Commissioner Tate's paper endorses the joint proposal of TracFone and Nexus to resolve the "bumper sticker issue of waste, fraud, and abuse" by utilizing a third party vendor to develop and implement a data base to prevent duplicate enrollment in violation of the current one-per-household limitation on Lifeline support.

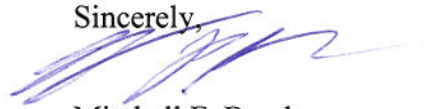
In addition to commending the proposal for an industry-led and industry-financed cost saving process, Commissioner Tate points out the irony that the Commission and others often applaud developing countries' ability to connect their citizens via wireless telecommunications while the U.S. could still do more to connect its own citizens, many of whom do not have access to a simple phone. Noting the incontrovertible fact that cell phones enable unemployed persons to pursue work opportunities, Commissioner Tate quotes former President Ronald Reagan: "Welfare's purpose should be to eliminate, as far as possible, the need for its own existence." Not insignificantly, the Lifeline program was created during President Reagan's administration. Lifeline is the kind of government-supported self-help program which should be nurtured, not allowed to erode to satisfy a bumper sticker concern about "waste, fraud, and abuse." There are before the Commission various alternative proposals for identifying and eliminating waste, fraud and abuse of the Lifeline program. See, e.g., November 10, 2011 ex parte presentation of TracFone Wireless in WC Docket No. 11-42. Those measures should be adopted and implemented rather than crippling the Lifeline program by requiring low income applicants for Lifeline benefits to produce documentation of their program-based eligibility or by capping the Lifeline program and denying its important benefits to those qualified persons who seek to enroll after a Commission-established cap has been reached.

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By this letter, TracFone Wireless, Inc. respectfully requests that Commissioner Tate's important and insightful paper be included in the record of this proceeding.

Pursuant to Section 1.1206(b) of the Commission's rules, this letter is being filed electronically. If there are questions, please communicate directly with undersigned counsel for TracFone.

Sincerely,



Mitchell F. Brecher

cc: Mr. Zachary Katz  
Ms. Lisa Hone  
Ms. Angela Kronenberg  
Ms. Christine Kurth  
Ms. Sharon Gillett  
Mr. Trent Harkrader  
Ms. Kimberly Scardino  
Mr. Jonathan Lechter  
Ms. Jamie Susskind

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# THE FREE STATE FOUNDATION

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Monday, November 21, 2011

## FCC Should Pursue Solutions to Make Lifeline an Efficient Job Line

Posted for Deborah Taylor Tate

Over the years, I've written a lot about the Lifeline-Linkup program which -- thankfully and finally -- is part of the [overall USF Reform](#) being undertaken by the FCC. As a former FCC Commissioner and Federal Joint Board Chair, I had really hoped to start the "reform" back in December 2009; however, better late than never. And sometimes I wish I were still at the FCC so I could put out a statement whenever companies step forward with creative, positive solutions to real problems.

This past weekend, two of the leading Lifeline providers -- Nexus and TracFone -- [announced a plan](#) to help resolve a "bumper sticker" issue of "waste, fraud and abuse," specifically as it relates to any duplication of Lifeline. By law, Lifeline is restricted to one subsidy per household. Nexus and TracFone "plan to engage a third party vendor to develop and implement a database which will enable all ETCs [eligible telecommunications carriers] to determine whether applicants for enrollment in their Lifeline programs are enrolled in other ETCs' Lifeline programs." The two providers intend to "reach out to other Lifeline providers to participate in this cooperative effort" to prevent and reduce incidences of duplicative enrollment in Lifeline.

The FCC has an opportunity to adopt an industry-led, voluntary, resolution that will be cost-saving -- *i.e.*, paid for by the companies themselves. It can certainly be implemented much more quickly than a burdensome bureaucratic government scheme. And, *most importantly*, it will resolve the problem.

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With 44 million Americans in poverty -- not to mention that a recent report recognized those communities are "predominantly of people of color" -- I have never understood why Lifeline was not being championed as a "job line." Even though the FCC and this Administration say they are intent upon getting **broadband** deployed to every American, how incredible that huge segments of our population still do not have access to a simple phone. (And how odd that we often applaud developing countries for connecting their poor to cell phones while we still can do more to help our own citizens to gain access to communications in the 21st Century!).

We all agree that any fraud should be investigated, waste reduced, and abuse stopped. And, in the abstract, more regulatory oversight, stiffer eligibility rules and additional hoops to get Lifeline make for a terrific sound bite. However, with unemployment continuing at an all time high and Americans facing ongoing tough times, we should utilize a program that could actually help solve larger societal problems: helping link up someone who is jobless to a job, or accessing necessary health care, or just finding out your child is sick.

Lifeline was created during the Reagan Administration. As President Reagan so eloquently put it: "Welfare's purpose should be to eliminate, as far as possible, the need for its own existence." Lifeline-Linkup is one of the few government programs that does precisely that.

And by the way: Just try leaving your cell phone at home for a day and see what its like to be without your lifeline.

Posted by Randolph J. May at [2:45 PM](#) 

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